

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

AGXPLORE INTERNATIONAL,)
LLC,)
))
Plaintiff,)) Case No. 1:23-cv-00108-SNLJ
v.))
))
JOSEPH DANIEL SHEFFER, et al.,))
))
Defendants.))
)

PLAINTIFF'S MOTION FOR SEALING

Plaintiff AgXplore International, LLC (“AgXplore”), respectfully submits this Motion for Sealing, pursuant to Local Rule 13.05. AgXplore seeks to file the following documents under seal in this matter:

- (1) Exhibit A to the parties’ Consent Temporary Restraining Order, which includes a list of AgXplore customers that Defendant Jeremy Sheffer is restricted from soliciting under the parties’ Consent Temporary Restraining Order; and
- (2) Exhibit B, to the parties’ Consent Temporary Restraining Order, which includes a list of AgXplore customers that Defendant Daniel Sheffer is restricted from soliciting under the parties’ Consent Temporary Restraining Order.

Exhibits A and B include lists of AgXplore customers that Defendants Jeremy Sheffer and Daniel Sheffer are restrained from soliciting under the parties’ Consent

Temporary Restraining Order. The customer lists constitute Confidential Information as defined by Defendants Jeremy Sheffer's and Daniel Sheffer's separate Non-Solicitation and Non-Disclosure Agreements. Because Exhibits A and B contain Confidential Information as defined by the agreements at issue in this action, Plaintiff requests that Exhibits A and B be sealed and remain sealed until a time when this Court deems it appropriate to unseal.

Respectfully submitted,

Dated: July 6, 2023

By: /s/ Ida S. Shafaie

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of July 2023, the foregoing was electronically filed with the Clerk of the Court and served by operations of the Court's electronic filing system upon all counsel of record.

/s/ Ida S. Shafaie